

## **REMARKS**

### **I. Introduction**

Claims 1-24 have been examined and are rejected. Specifically, claims 1-11, 14 and 16-24 are rejected under 35 U.S.C. § 101, as allegedly being directed to non-statutory subject matter; claims 1-2 and 7-24 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent Publication No. 2004/0167764 to newly applied Wohl et al. (hereinafter “Wohl”); and claims 3-6 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Wohl in view of the publication CCITT, Recommendation X.722, Information Technology -- Open Systems Interconnection -- Structure of Management Information: Guidelines for the Definition of Managed Objects, 1992 (hereinafter “the CCITT publication”).

### **II. Claim Rejections – 35 U.S.C. § 101**

As noted above, claims 1-11, 14 and 16-24 stand rejected under § 101 as allegedly being directed to non-statutory subject matter. In particular, the Examiner’s position is that the claims do not expressly require performance of any steps by a machine, such as a general-purpose digital computer.

Applicants’ representative discussed these rejections with the Examiner in a telephone conference held on February 17, 2005.<sup>1</sup> It is respectfully submitted that the amendments to claims 1-2 and 7-11 overcome the § 101 rejections of claims 1-11, 14 and 16-24. Support for

---

<sup>1</sup> See Interview Summary mailed on February 22, 2005.

these amendments can be found, for example, on page 7, lines 23-27 of Applicants' specification.

### **III. Claim Rejections – 35 U.S.C. § 102(e)**

As noted above, claims 1-2 and 7-24 stand rejected under § 102(e) as allegedly being anticipated by Wohl.

Applicants have amended claim 1 to incorporate the subject matter of claim 2 therein, in order to further clarify the various stages of information model decomposition. Consequently, claim 2 is canceled to avoid redundancy and claim 15 is amended to correct its dependency.

Claim 1, as amended, recites, *inter alia*, “incorporating definitions of a plurality of subcomponents of an overall system to generate a first information model in coded form in a first description language; ... using the first information model to generate one or more product-specific information models by selecting one or more first parameters; and ... using the one or more product-specific information models to generate one or more project-specific information models by selecting one or more second parameters.”

Thus, claim 1 recites three distinct information models. A first information model includes definitions of various subcomponents forming an overall system. Thereafter, the first information model is used to form a second information model by extracting only those definitions from the first information model that are relevant to the specific product, as indicated by the first parameters. Then, a third information model, which is specific to a project, is

generated from the second information model based on which performance features are to be supported or not supported, as indicated by the second parameters.

The Examiner alleges that Wohl discloses these features of claim 1 by describing the construction of automatic test pattern generation (ATPG) models (*see* Office Action: page 5; *citing* Wohl: Figs. 3 and 6B). Applicants respectfully disagree.

In Wohl, a simulation library 301 contains behavioral descriptions of various cell types including memories (Wohl: paragraph no. [0043]; and Fig. 3). An Automatic Test Pattern Generation (ATPG) memory model generation process, for generating ATPG models (*i.e.*, structural models) 320, reads the behavioral descriptions for read-only memories (ROMs) directly (*Id.*). The ATPG memory models 320 contain ATPG memory primitives 325 (*Id.*). The conversion of simplified behavioral models into structural models, as described in Wohl, fails to teach or suggest the three recited information models, let alone that a project-specific information model is derived from a product-specific information model, which itself was derived from a first master information model.

Consequently, claim 1 is not anticipated by Wohl. Therefore, claims 14-15 and 19-21 are not anticipated by Wohl, at least by virtue of their dependency.

Similarly, Applicants have amended claim 7 to incorporate the features of claim 9 therein. Consequently, claim 9 is canceled to avoid redundancy and claim 18 is amended to correct its dependency. Thus, as amended, claim 7 is not anticipated by Wohl based on a rationale analogous to that set forth above for claim 1. Therefore, claims 8, 16-18 and 23-24 are not anticipated by Wohl, at least by virtue of their dependency.

AMENDMENT UNDER 37 C.F.R. § 1.116  
U.S. Application No. 09/902,579  
Attorney Docket No. Q65122

Claims 10 and 11 are also amended to recite a three-stage decomposition to get project-specific information models. Furthermore, claims 12 and 13 are amended to depend from claims 10 and 11, respectively. It is respectfully submitted that Wohl does not anticipate claims 10-13 in view of these amendments.

#### **IV. Claim Rejections – 35 U.S.C. § 103(a)**

As noted above, claims 3-6 stand rejected under § 103(a) as allegedly being unpatentable over Wohl in view of the CCITT publication. As noted below, claim 6 is canceled.

The CCITT publication fails to make up for the exemplary deficiencies of Wohl, as set forth above for claim 1. Thus, it is respectfully submitted that claims 3-5 are patentable over the proposed combination of Wohl in view of the CCITT publication at least by virtue of their dependency.

#### **V. Formal Matters – Claims**

Claim 6 has been canceled without prejudice or disclaimer.

#### **VI. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.116  
U.S. Application No. 09/902,579  
Attorney Docket No. Q65122

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



---

Billy Carter Raulerson  
Registration No. 52,156

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

Date: April 12, 2005